

MOBILE6 Preliminary SIP and Conformity Policy Guidance

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April 30, 2001

Proposed M6 SIP and Conformity Policy

- EPA has prepared proposed draft MOBILE6 SIP and conformity document
 - Currently under review within EPA
 - Will release draft version to state and local agencies
 - Final version will be released when M6 is released to public
- Proposed policy focuses on how to incorporate M6 into SIP and conformity activities
- Proposed policy is designed to give states sufficient time for an orderly transition from M5 to M6

Who doesn't have to consider use of M6 in the short term?

- States who have already submitted M5-based SIPs
- States who are about to submit M5-based SIPs soon after release of M6
- States subject to 10/15/01 consent decree deadline

When should M6 be used in SIPs?

- We propose that states use MOBILE6 for new SIPs
 - Meets CAA requirement that SIPs be based on most current available information
 - Could improve transition for future conformity determinations
- We propose that states who have not yet started or who are in the very early stages of SIP development use MOBILE6

What about M5-based SIPs that include Tier 2 benefits?

- EPA provided interim estimates of Tier 2 benefits that could be applied to M5 emission factors
- States that rely on those estimates in their SIPs already committed to revise and resubmit motor vehicle budgets 1-2 years after final release of M6

When must M6 be used for new conformity analyses?

- In general, transportation conformity rule requires use of most recent estimates and models
- Rule allows for a grace period from 3 to 24 months

When must M6 be used for new conformity analyses? (cont'd)

- EPA and DOT are proposing the maximum 24 month grace period before M6 is required for new analyses
 - Gives time for states to evaluate effects of M6 on future determinations
 - Gives time for states to determine need to update SIPs and budgets with MOBILE6
- States that update budgets with M6 earlier must use M6 earlier for conformity

If you want to update SIP using M6, what does it need to include?

- Updated SIP continues to demonstrate attainment/maintenance with new level of estimated emissions
 - There are multiple options for how this could be done
- EPA will work with states on a case-by-case basis to determine exactly what documentation is needed
 - States should consult with EPA early and often

Summary of Preliminary Proposal for SIP and Conformity Policy

- Don't need to revise SIP:
 - Already or about to submit
 - Ozone areas subject to 10/15/01 deadline
- Need to update SIP in 1-2 years:
 - SIPs that include Tier 2 benefits
- Conformity grace period
 - 2 Years
- EPA and states will need to assess the full implications of M6 on air quality in the context of changes in both base and future year emissions